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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

LUCAS OSTOLAZA,

Defendant.

Case No.: 23–CR-00317-HSG-2

**STIPULATION AND ORDER TO
CONTINUE BOND HEARING**

United States Pretrial Services submitted a PS8 Memorandum on October 26, 2023. Dkt. # 12. In the PS8, Pretrial Services requested a hearing two weeks later, because additional information was still pending.

This Court set the matter for a bond hearing on November 9, 2023. Dkt. # 15. Defense counsel, the assigned Assistant United States Attorney, and Pretrial Officer Portillo have conferred about the hearing, and additional information is still pending: specifically, photos of the alleged damage to the transmitter have not yet been released to the defense and the government, and BI Incorporated, the company that manufactures the transmitter, has not yet provided Pretrial with an analysis report.

Mr. Ostolaza has also started working, and there have been no other issues with his location monitoring technology.

1 In order to conserve court resources, the parties are requesting the status set for November 9,
 2 2023, be set, instead, for November 22, 2023. This which should enable BI Incorporated to be able to
 3 provide Pretrial with the analysis. In addition, the parties respectfully request this Court order that the
 4 photographs of the transmitter and the BI Incorporated analysis, when it is received, be turned over to
 5 the government and the defense.

6 Accordingly, the parties stipulate and request that the bond hearing be moved from November
 7 9, 2023 to November 22, 2023, at 10:30 a.m., and request an order for Pretrial Services to release any
 8 information about the allegation (including photos of the transmitter and the BI Incorporated
 9 analysis) to the parties.

10
 11
 12 Dated: November 8, 2023

Respectfully submitted,

13 JODI LINKER
 14 Federal Public Defender
 Northern District of California

15 /S/

16 SAMANTHA JAFFE
 Assistant Federal Public Defender

17
 18
 19 Dated: November 8, 2023

20 ISMAIL J. RAMSEY
 21 United States Attorney
 Northern District of California

22 /S/

23 SOPHIA COOPER
 Assistant United States Attorney

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FOR THE NORTHERN DISTRICT OF CALIFORNIA
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UNITED STATES OF AMERICA,

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Case No.: 23–CR-00317- HSG-2

**ORDER TO CONTINUE BOND
HEARING**

Based on the agreement of the parties in the stipulation above, the bond hearing presently set for November 9, 2023, at 10:30 a.m., is vacated. This matter is reset to November 22, 2023, at 10:30 a.m. In addition, Pretrial Services is ordered to turn over materials regarding the allegation (including photographs of the transmitter and the BI Incorporated analysis) to the parties.

IT IS SO ORDERED.

Dated: November 8, 2023



THE HON. KANDIS A. WESTMORE
United States Magistrate Judge